

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
BIG LOTS, <i>et al.</i> , ¹	Case No. 24-11967 (JKS)
Debtors.	(Jointly Administered)
	Related Docket Nos. 1962, 2012

**JOINDER AND RESERVATION OF RIGHTS OF POPCORN ALLEY, INC. D/B/A
STONEHEDGE FARMS TO SHANDONG TAIPENG INTELLIGENT HOUSEHOLD
PRODUCTS CO. OBJECTION TO MOTION OF DEBTORS FOR ENTRY OF AN
ORDER (I) SETTING A BAR DATE FOR FILING PROOFS OF CLAIMS FOR PRE-
CLOSING ADMINISTRATIVE EXPENSE CLAIMS AGAINST THE DEBTORS, (II)
ESTABLISHING PRE-CLOSING ADMINISTRATIVE EXPENSE CLAIMS
PROCEDURES, AND (III) GRANTING RELATED RELIEF, INCLUDING NOTICE
AND FILING PROCEDURES**

Popcorn Alley, Inc. d/b/a Stonehedge Farms (“Popcorn Alley”), by and through its counsel, hereby files this Joinder and Reservation of Rights (the “Joinder”) to the *Shandong Taipeng Intelligent Household Products Co. Objection to Motion of Debtors for Entry of an Order (I) Setting a Bar Date for Filing Proofs of Claims for Pre-Closing Administrative Expense Claims Against the Debtors, (II) Establishing Pre-Closing Administrative Expense Claims Procedures and (III) Granting Related Relief, Including Notice and Filing Procedures* (the “Objection”) (D.I. 2012). In support of this Joinder, Popcorn Alley respectfully states:

1. On September 9, 2024, the above-captioned debtors (the “Debtors”) filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

2. On February 11, 2025, Popcorn Alley filed the *Motion of Popcorn Alley, Inc. d/b/a Stonehedge Farms for Allowance and Payment of Administrative Claim under 11 U.S.C. §503(b)(1)(A)* (the “Admin Claim”) (D.I. 1965).

3. On February 7, 2025, the Debtors filed the *Motion of Debtors for Entry of an Order (I) Setting a Bar Date for Filing Proofs of Claims for Pre-Closing Administrative Expense Claims Against the Debtors, (II) Establishing Pre-Closing Administrative Expense Claims Procedures and (III) Granting Related Relief, Including Notice and Filing Procedures* (the “Motion”) (D.I. 1962) requesting the Court enter an order allowing the debtor to pay certain administrative claims and not others.

4. On February 19, 2025, Shandong Taipeng Intelligent Household Products Co. filed its Objection to the Motion (D.I. 2012).

5. Popcorn Alley hereby joins in, supports, and incorporates herein by reference, the Objection, and adopts the arguments in the Objection as its own.

6. This Joinder is submitted without prejudice to, and with full reservation of, Popcorn Alley’s rights, claims, defenses, and remedies, including the right to supplement the Joinder or modify, amend, or withdraw this Joinder, to seek discovery, to raise additional arguments and to introduce evidence at any hearing related to the Objection, and without in any way limiting any other rights of Popcorn Alley to respond to the Objection, on any grounds, as may be appropriate.

WHEREFORE, Popcorn Alley respectfully requests that the Court overrule the Motion.

Dated: February 20, 2025
Wilmington, Delaware

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